

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

KYUANE SEMAJ MCKIBBINS (01)

No. 4:24-MJ-842

CLERK, U.S. DISTRICT COURT

By _____
Deputy

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

OCT 29 2024

CRIMINAL COMPLAINT

I, United States Postal Inspector James Sicks, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about October 6, 2024, in the Northern District of Texas, **Kyuane Semaj McKibbins**, the defendant, did unlawfully have in his possession mail matter, specifically United States Mail, which had been stolen, taken, embezzled and abstracted from the United States mail, knowing said mail matter to have been stolen in violation of 18 U.S.C. § 1708

Probable Cause:

1. I am a Federal Agent employed by the United States Postal Inspection Service (USPIS), duly appointed and so employed since 2007. My duties include investigating mail theft, mail fraud, identity theft, access device fraud, bank fraud, and violent crimes committed against United States Postal Service (USPS) employees. The statements in this affidavit are set forth to establish probable cause and are true and correct to the best of my knowledge and belief, but do not include all evidence or information revealed during my investigation.

THE INVESTIGATION

Incident 1 – Mail Theft from Post Office, 505 Fountain Pkwy, Grand Prairie, TX 75050

2. On or about 18:55 on 7/15/24, at the United States Postal Service (USPS) Post Office, 505 Fountain Pkwy, Grand Prairie, TX 75050, a “sneak theft” occurred in which an unauthorized subject entered the non-public loading dock on the Post Office property. The subject entered the cargo area of a USPS truck parked at the dock. He was observed by a USPS truck driver to be rifling through United States Mail inside the cargo area of the truck. The USPS truck driver indicated the subject inside the trailer was a young Black male with a thin build and an approximate height of 5’7” to 5’9”.
3. Unfamiliar with this subject, the USPS truck driver went inside the Post Office and returned with an employee of the local Post Office. The employees then observed a black sport utility vehicle departing the vicinity of the Post Office at a high rate of speed.
4. The local Post Office employee identified Express Mail parcels were missing from the truck where the subject had been observed. A subsequent analysis of Postal business records determined six (4) parcels received no further processing scans following the incident. As such, I believe the subject removed these parcels and departed with them in the subject vehicle.

5. A review of surveillance video in the vicinity by Postal Inspectors identified a vehicle conducting pre-surveillance passes of the Post Office prior to parking behind the facility, consistent with the timing of the theft. The vehicle was then observed on video departing at a high rate of speed consistent with the timing and description of the Postal Employees. The vehicle observed on video at the Post Office was visually consistent with a black Mercedes GLE. The depicted vehicle had black wheels and no front license plate. A black Mercedes GLE consistent with the vehicle seen at the Post Office on surveillance video was observed a short time and distance later on a Flock camera also located in Grand Prairie, TX. The timing of the vehicles appearance on Flock consistent of the direction of travel and rate of speed observed on the surveillance cameras in the vicinity of the Post Office.

6. Through a review of law enforcement databases, the vehicle seen on the Flock camera was subsequently identified as a 2022 Mercedes GLE, California License Plate 9CGA104, and VIN 4JGFD6BB8NA776552 (subject vehicle) registered to subject "L.A." A review of records of law enforcement encounters of the subject vehicle identified the vehicle is known to be operated by subject Kyuane McKibbins. McKibbins is a Black male and at the time of offense was approximately 24 years of age. McKibbins' Texas Driver's License lists a height of 5'8", consistent with the description provided by the USPS truck driver. McKibbins has extensive violent criminal history including murder, use of firearms in commission of a felony, kidnapping, false imprisonment, and burglary.

7. On or about 7/19/24, Postal Inspectors located the subject vehicle at an apartment complex in Dallas, TX: The Victor, 3039 Nowitzki Way, Dallas, Tx 75219. Records from the apartment complex show subject "L.A.," the registrant of the subject vehicle, leases apartment 2612 at the apartment complex. McKibbins' name was listed as his/her Emergency Contact with a relationship of "Boyfriend" and his phone number as 818-466-4361, on his/her submitted leasing paperwork. The subject vehicle located by Postal Inspectors at the apartment complex had black wheels and no front license plate, consistent with the vehicle observed on the video at the Post Office. It displayed the same license plate on the rear captured on the vehicle at the Flock camera near the Post Office following the sneak theft.

8. McKibbins provided his phone number, 818-466-4361, to officers of the Rose City Marshal's Office, during a traffic stop on or about 5/4/2024 at which time he was driving the subject vehicle.

9. On or about 7/17/2024, Postal Inspectors reviewed a real-time cellular carrier database entry for McKibbins' phone number, 818-466-4361, which showed the phone number was held by T-Mobile and assigned to Kyuane McKibbins.

10. Based on the above, Postal Inspectors obtained Northern District of Texas Search Warrant 4:24-MJ-621 on August 14, 2024, to obtain records related to McKibbins' T-Mobile cellular phone. A subsequent review of cellular records confirmed the account was held in Kyuane McKibbins' name.

11. A review of cellular geolocation records for McKibbins' cellular phone, XXX-XXX-4361, surveillance video, and apartment complex gate logs for the subject vehicle at The Victor on the date of the sneak theft shows the following timeline (times approximate) on 7/15/2024:

- 18:35 -- McKibbins' cellular phone pings in the vicinity of Interstate 30 and State Hwy 360 and 161. The device utilized the sector of the cell tower facing the Post Office. The cell tower is located approximately 2.1 miles from the Post Office.
- 18:48 – A Mercedes GLE is visible on cameras beginning surveillance of the Post Office
- 18:50 – A Mercedes GLE parks behind dock of the Post Office
- 18:56 – A Mercedes GLE pulls out from behind the dock of the Post Office and speeds away eastbound from the Post Office
- 18:58:37 – subject vehicle is scanned by a Flock camera at SB Carrier Pkwy and N Arbor Rose Dr. The camera is approximately 1.7 miles from the Post Office in a direct line and approximately 2.4 miles from the Post Office in a driving route suggested by Google maps.
- 19:18:01 – subject vehicle opens gate at the Victor Apartment in Downtown Dallas
- 19:19:51 – McKibbins' cellular phone pings in vicinity of the Victor Apartment in Downtown Dallas

Incident 2 – Attempted Mail Theft from Post Office, 8604 Turtle Creek Blvd, Dallas, TX 75225

12. On or about 14:54 on 9/23/24, at the United States Postal Service (USPS) Post Office, 8604 Turtle Creek Blvd, Dallas, TX 75225 an attempted “sneak theft” occurred in which an unauthorized subject entered the non-public loading dock on the Post Office property. The subject was observed by a USPS employee to be rifling through United States Mail on the dock. The USPS employee indicated the subject was a Black male wearing a hooded sweatshirt and a surgical-type mask with an approximate height of 5’7”. McKibbins is a Black male. McKibbins’ Texas Driver’s License lists a height of 5’8”, consistent with the description provided by the USPS employee.

13. Not recognizing the subject on the dock, the USPS employee asked the subject, “Can I help you?” to which the subject responded “No.” The subject then pulled the hood of his sweatshirt lower over his head, ran across the dock, and jumped down to the subject vehicle parked behind the dock. The subject entered the vehicle and drove away.

14. The USPS employee captured pictures of the subject and vehicle as the subject fled to the vehicle and departed. Pictures taken by the employee confirm the vehicle was bearing California License Plate 9CGA104, consistent with the subject vehicle.

15. On or about September 25, 2024, Postal Inspectors observed McKibbins operating the subject vehicle in Dallas, TX.

16. Based on the above, Postal Inspectors obtained Northern District of Texas Warrant for a Tracking Device 4:24-MJ-746 on September 25, 2024, authorizing the installation of a GPS tracking device on the subject vehicle.

Investigators installed the tracking device on the vehicle on or about 10/2/2024.

Incident 3 – Mail Theft from USPS Collection Box at Post Office, 2300 Story Rd W, Irving, TX 75038

17. Through a review of tracking data of the movements of the subject vehicle, Postal Inspectors noted that the vehicle had traveled to at the United States Postal Service (USPS) Post Office located at 2300 Story Rd W, Irving, TX 75038 on multiple days and times.

18. A review of the tracking data showed the vehicle had been on the property of the United States Postal Service (USPS) Post Office located at 2300 Story Rd W, Irving, TX 75038 on or about 10/6/2024, at approximately 16:28. Postal Inspectors reviewed surveillance video at the facility and observed the subject vehicle enter the vehicle drive through where the USPS collection boxes are located. When the driver's side window rolls down, a reflection consistent with the appearance of a Black male driver is visible in the driver's side mirror.

19. The driver then leans out of the window and inserts a plastic bag into the opening of the collection box where customers place outgoing letters. The driver then spends time in an apparent effort to secure the bag into a position hidden within the collection box. The portion of the driver's face visible on the surveillance video is visually consistent with McKibbins' appearance.

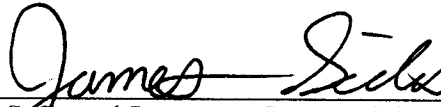
20. Mail thieves are known by Postal Inspectors to employ techniques such as placing objects into collection boxes to stop mail from falling completely inside the box so it can be retrieved at a later time by the thief.

21. Following the subject placing the bag within the collection box, surveillance video then shows five USPS customers come through the drive through at approximately 16:29, 17:31, 18:34, 19:21, and 20:00. Each customer places mail into the collection box where the subject had placed the hidden bag.

22. Postal Inspectors made contact with four of the customers who had placed outgoing mail in the collection box during the times above. Each customer indicated the mail they had placed in the collection box had not been received by the intended recipients.


23. Surveillance video shows the subject vehicle returns on 10/6/2024 at approximately 21:34. The driver rolls down the window, reaches into the USPS collection box, and removes the hidden bag. While the bag is visible, its shape is visually consistent with a thin plastic bag containing mail. The driver then drives away with the bag in the subject vehicle.

24. Based upon the foregoing facts and information, I respectfully submit that there is probable cause to believe that **Kyuane Semaj McKibbins** did unlawfully have in his possession an article contained in the mail that had been stolen, taken, embezzled and abstracted from an authorized depository for mail matter, knowing the said article was stolen, taken, embezzled and abstracted from an authorized depository for mail matter in violation of 18 U.S.C. § 1708.



U.S. Postal Inspector James Sicks
United States Postal Inspection Service

SWORN TO and SUBSCRIBED before me this 29th day of October, 2024 at 1:36 a.m. ~~p.m.~~ in Fort Worth, Texas.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE